

Exhibit 2



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December 20, 2017

By Certified Mail

Office of Information Programs and Services
A/GIS/IPS/RL
Department of State, SA-2
Washington, DC 20522-8100

Re: Freedom of Information Act Request

Dear FOIA Officer:

This is a request under the Freedom of Information Act, 5 U.S.C. §§ 552, et seq., for complete copies of the records listed below. The period of this request is **January 1, 2006 through December 31, 2009.**

Records Requested

All records (e.g. reports, memoranda, interview notes, emails, or other communications) authored by members of: a) the Iraq Reconstruction Management Office ("IRMO") Office of Accountability and Transparency ("OAT") of the U.S. Embassy in Iraq; or b) OAT's successor, the Anti-Corruption Coordination Office (ACCO), concerning:

1. Iraq's Ministry of Health ("MOH"); or
2. Dr. Adel Muhsin Abdullah al-Khazali (a/k/a Dr. Adel Muhsin, or Dr. Adel Mohsin), the Inspector General of MOH; or
3. Hakim al-Zamili (a/k/a Hakim Abbas Mousa Abbas al-Zamili (or Zamili)), Iraq's Deputy Minister of Health; or
4. Kimadia, MOH's state-owned import subsidiary; or
5. Iraq's Commission on Public Integrity (CPI); or
6. Judge Radhi Hamza al-Radhi (a/k/a Judge Radhi al-Radhi), the CPI Commissioner; or
7. Muqtada al-Sadr (a/k/a Muqtada Sadr);
8. Jaysh al-Mahdi (a/k/a Jaysh al-Mehdi, The Mehdi Army, The Mahdi Army, or the Mahdi Militia).

Such records include, but are not limited to, **final versions** of the following reports, reviews, memoranda, or correspondence issued by IRMO/OAT, ACCO, or its members:

1. "The Six-Month Review of Iraq's Performance & Capacity in Enforcing Its Anticorruption Laws," finalized and/or issued on or about December 24, 2006;¹
2. "The Second Six-Month Review of Iraq Anticorruption Activities," finalized and/or issued from on or about July to September 2007;
3. Any other **final** review of, or report on, Iraq Anticorruption Activities finalized and/or issued by IRMO/OAT or ACCO from January 1, 2006 through December 31, 2009;
4. The "Anti-Corruption Baseline Report," authored/edited by OAT Chief of Staff James Mattil and issued on or about January 2007;
5. A memorandum dated July 19, 2007 from OAT Director Arthur Brennan assessing corruption in the Iraqi government;
6. A letter, prepared and transmitted by OAT and/or its members in mid-July 2007 responding to a draft report to be issued by the Special Inspector General for Iraq Reconstruction (SIGIR) regarding U.S. anticorruption efforts in Iraq.

Please search for responsive records regardless of format, medium, or physical characteristics. Where possible, **please produce records electronically, in PDF format**. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs. Our request includes any letters, emails, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, discussions, and any attachments to such records.

For any responsive records you deem covered by any applicable exemption, please provide an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1972). As you are aware, a Vaughn index must describe each document claimed as exempt with sufficient specificity "to permit a reasoned judgment as to whether the material is actually exempt under FOIA." *Founding Church of Scientology v. Bell*, 603 F.2d 945, 949 (D.C. Cir. 1979). The Vaughn index must also "describe each document or portion thereof withheld, and for each withholding it must discuss the consequences of supplying the sought-after information." *King v. US Dep't of Justice*, 830 F.2d 210, 223-24 (D.C. Cir. 1987) (emphasis added). Further, "the withholding agency must supply 'a relatively detailed justification, specifically identifying the reasons why a particular exemption is relevant and correlating those claims with the particular part of a withheld document to which they apply.'" *Id.* at 224 (citing *Mead Data Central v. US Dep't of the Air Force*, 566 F.2d 242, 251 (D.C. Cir. 1977)). See also *Johnson v. Exec. Office for U.S. Attorneys*, 310 F.3d 771, 776 (D.C. Cir. 2002). If you believe that some portions of the requested records are exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. See 5 U.S.C. §

¹ A near-final version of this report is available at <https://fas.org/irp/eprint/anticorruption.pdf>.

552(b). If you believe a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. *Mead Data Central*, 566 F.2d at 261. Claims of non-segregability must be made with the same degree of detail as required for claims of exemptions in a Vaughn index.

I am willing to pay fees for this request up to a maximum of \$200. If the fees for this request exceed that amount, please inform me first.

Thank you for addressing my request. You can reach me by email at the address below, or by phone at (202) 629-3530. You can mail responsive materials to the address above.

Sincerely,



Sarah L. Allen

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